

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----  
In re:

LORING ESTATES LLC, et al.,

**Chapter 7  
Case No. 12-45757 (NHL)  
Jointly Administered**

Debtors.

-----  
ROBERT L. GELTZER, as Chapter 7 Trustee  
of LORING ESTATES LLC, ET AL.,

**Adv.Pro.No.14-01104 (NHL)**

Plaintiff

-against-

LAEEQ A. BAJWA

Defendant  
-----

**ANSWER**

Ziegler and Robinson, as attorneys for the defendant, Laeeq A. Bajwa hereby answer the Plaintiff's complaint.

**AS TO THE FACTS**

1. Denies knowledge or information sufficient to form a belief as to the allegations of paragraphs 7,8,9,10,11,12,and 14.
2. Denies each and every allegation set forth in paragraph 13.

**AS TO COUNT ONE**

3. The defendant realleges and incorporates by reference the answer to the allegations set forth in the preceding paragraphs of this answer as is set forth herein.
4. Denies each and every allegation set forth in paragraph 16, 17, 18, and 19.

**AS TO COUNT TWO**

5. The defendant realleges and incorporates by reference the answer to the allegations set forth in the preceding paragraphs of this complaint as if fully set forth.

6. Denies each and every allegation set forth in paragraphs 20, 21, 22, 23, 24, 25, and 26.

**AS TO COUNT THREE**

7. The defendant realleges and incorporates by reference the answers to the allegations set forth in the preceding paragraphs of this complaint as if fully set forth.

8. Denies each and every allegation set forth in paragraph 28.

**AFFIRMATIVE DEFENSES**

**FIRST AFFIRMATIVE DEFENSE**

9. The defendant hereby alleges that this action is time barred by the pertinent Statute of Limitations in that any transaction occurred at least six years prior to the service of a summons and complaint.

**SECOND AFFIRMATIVE DEFENSE**

10. The defendant has never received the full amount of the sums as alleged in the complaint.

**THIRD AFFIRMATIVE DEFENSE**

11. The sums which are alleged to have been paid to the defendant were returned to the debtor or its agents by him.

**FOURTH AFFIRMATIVE DEFENSE**

12. The defendant was the victim of a fraudulent scheme perpetrated by the debtor and plaintiff Loring Estates, INC. and has thereby sustained a large monetary loss, which is much greater than the sums which debtor-plaintiff alleges is owed to it.


**RELIEF REQUESTED**

Wherefore the defendant requests that Counts One, Two and Three be dismissed with costs and disbursements and that the Court grant any additional relief as this Court deems just and equitable.

Dated: New York, New York

August 26, 2014

Ziegler & Robinson  
Attorneys for the defendant

By   
George R. Ziegler, Esq.  
25 West 43rd Street, Suite 711  
New York, New York 10036  
Phone(212) 213-0030  
Fax(212) 696-9417  
Zieroblaw@yahoo.com

To:  
Tarter Krinsky & Drogin LLP  
Robert A. Wolf, Esq.  
Lisa M. McIntyre, Esq.  
1350 Broadway, 11th Floor  
New York, New York 10018  
Phone (212) 216-8000  
Fax (212) 216-8001  
rwolf@tarterkrinsky.com  
lmcintyre@tarterkrinsky.com

AFFIRMATION OF SERVICE

STATE OF NEW YORK, COUNTY OF NEW YORK: ss:-

The undersigned, an attorney admitted to practice in the Courts of the State of New York, under penalty of perjury, states that deponent is not a party to this action, is over 18 years of age and resides at Nassau County, New York.

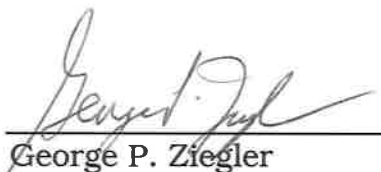
That on the 28<sup>th</sup> day of August, 2014, deponent served the within ANSWER on:

Tarter Krinsky & Drogin LLP  
Robert A. Wolf, Esq.  
Lisa M. McIntyre, Esq.  
1350 Broadway, 11th Floor  
New York, New York 10018

at the address designated by said attorneys for that purpose, by depositing a true copy of same enclosed in a postpaid, properly addressed wrapper in an official depository under the exclusive care and custody of the United States Post Office Department within the State of New York and Via Email to [rwolf@tarterkrinsky.com](mailto:rwolf@tarterkrinsky.com) and [lmcintyre@tarterkrinsky.com](mailto:lmcintyre@tarterkrinsky.com).

Dated: New York, New York

August 28<sup>th</sup>, 2014

  
George P. Ziegler